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May 16, 2013

Attention: Robert deV. Frierson  
Secretary  
Board of Governors of the Federal Reserve System  
20<sup>th</sup> Street & Constitution Avenue, NW  
Washington DC, 20551

RE: Proposed Interagency Questions and Answers Regarding Community Reinvestment (March 2013) **FRS**  
**Docket No. DP-1456**

Dear Secretary Frierson:

Deutsche Bank appreciates this opportunity to comment on the proposed changes to certain questions and answers under the Community Reinvestment Act (CRA). As a wholesale institution under the CRA, Deutsche Bank Trust Company Americas deploys capital for the benefit of distressed communities through the lending and investment activities of its Community Development Finance Group and the Deutsche Bank Americas Foundation where we frequently partner with community development financial institutions (CDFIs) and other local, regional and national intermediaries.

We applaud the OCC, the Board and the FDIC for seeking to facilitate greater bank investment in areas of high need that are outside of a bank's given CRA assessment area, and agree that providing banks with clarity around such activities will help in this matter.

To further encourage banks to invest in non-assessment area geographies where needs are acute and bank financing is scarce, we suggest that CRA examiners consider giving banks qualitative "extra credit" for undertaking community development lending and investing in such areas. This "extra credit" could be acknowledged and accounted for similarly to the way "innovativeness" and "responsiveness" is currently considered. These jurisdictions may be affirmatively designated by regulators on the basis of statistical indicators that demonstrate high need and relative lack of bank financing. We believe such an approach could help bring resources and capital to high need communities throughout the U.S. especially to those areas lacking significant bank presence.

We would be pleased to further discuss this with you. Thank you for consideration of our comments.

Sincerely,



Gary Hattem  
Managing Director & CRA Officer  
Community Development Finance Group  
Deutsche Bank Trust Company Americas